

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

In re:

Q'Max America, Inc., et al.

Debtors.

**Christopher R. Murray, Chapter 7
Trustee**

Plaintiff,

V.

**PricewaterhouseCoopers LLP, and
PricewaterhouseCoopers Advisory
Services, LLC,**

Defendants.

CHAPTER 7

CASE NO. 20-60030 CML

Jointly Administered

ADVERSARY NO. 22-06049

**JOINT MOTION FOR ENTRY OF ORDER
APPROVING THE PARTIES' STIPULATION**

Plaintiff Christopher R. Murray, Chapter 7 Trustee and Defendants
PricewaterhouseCoopers LLP and PricewaterhouseCoopers Advisory Services, LLC by and
through their undersigned counsel, hereby file this Joint Motion for Entry of Order Approving the
Parties' Stipulation.

1. Plaintiff Christopher R. Murray, Chapter 7 Trustee commenced this action in the District Court for the Southern District of Texas on May 23, 2022. ECF No. 1.
2. On July 27, 2022, this case was referred to Bankruptcy Court for the Southern District of Texas. ECF No. 20.

3. Defendants PricewaterhouseCoopers LLP and PricewaterhouseCoopers Advisory Services, LLC's deadline to file and serve responsive pleadings was July 14, 2022.

4. The parties previously agreed and stipulated that: Defendants PricewaterhouseCoopers LLP and PricewaterhouseCoopers Advisory Services, LLC's deadline to file and serve responsive pleadings would be extended to August 15, 2022. ECF No. 19.

5. Pursuant to this Court's docket entry on August 3, 2022, all deadlines, including but not limited to the deadline to answer an adversary complaint, were stayed by the Court to a date to be determined.

6. Thereafter this Court set a response deadline as September 30, 2022.

7. The parties previously agreed to an extension until October 28, 2022, for Defendants PricewaterhouseCoopers LLP and PricewaterhouseCoopers Advisory Services, LLC to file and serve responsive pleadings.

8. The parties have since agreed to settle Trustee's claims against Defendants PricewaterhouseCoopers LLP and PricewaterhouseCoopers Advisory Services, LLC, and are currently cooperating to effectuate the necessary settlement agreements and pleadings to be filed with the Court. As such, the parties have agreed and stipulated to an abatement of all deadlines in this adversary proceeding to allow the parties to finalize all necessary documents and obtain Court approval of their settlement.

9. The parties respectfully request the Court approve their stipulation and enter an order abating all deadlines in this adversary proceeding to allow the parties to effectuate the necessary settlement agreement documents and pleadings.

Dated: October 28, 2022

Respectfully submitted,

MCDOWELL HETHERINGTON LLP

/s/ Nicholas R. Lawson

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**COUNSEL FOR
PRICEWATERHOUSECOOPERS LLP AND
PRICEWATERHOUSECOOPER ADVISORY
SERVICES LLC**

CERTIFICATE OF CONFERENCE

I hereby certify that on October 28, 2022, I conferred with counsel for Defendants by email, and all parties are agreed to the stipulations set forth, and the relief requested, herein.

/s/ Matthew T. Caldwell

Matthew T. Caldwell

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Joint Motion for Entry of Order Approving the Parties' Stipulation* was served upon the following counsel of record on this 28th day of October 2022, via the Notice of Electronic Filing e-mail generated by the Court's CM/ECF system.

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/s/ Nicholas R. Lawson

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